

1 DAN MARMALEFSKY (CA SBN 95477)
dmarmalefsky@mofo.com
2 MORRISON & FOERSTER LLP
707 Wilshire Boulevard
3 Los Angeles, California 90017-3543
Telephone: 213.892.5200
4 Facsimile: 213.892.5454

5 TIFFANY CHEUNG (CA SBN 211497)
6 TCheung@mofa.com
7 MORRISON & FOERSTER LLP
8 425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE COMPANY

15 JESSICA LEE, individually and on behalf of a class of similarly situated individuals,

Plaintiff,

V.

18 STONEBRIDGE LIFE INSURANCE
19 COMPANY, a Vermont corporation, and
20 TRIFECTA MARKETING GROUP LLC, a
Florida limited liability company,

21 Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND
[PROPOSED] ORDER STAYING
DISCOVERY AND
IMPLEMENTATION OF NOTICE
PLAN FOR FOUR WEEKS**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011
Trial Date: June 23, 2014

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2 Defendant Stonebridge Life Insurance Company (“Stonebridge”), Trifecta Marketing
3 Group LLC (“Trifecta” and collectively with Stonebridge, “Defendants”) and Plaintiff Jessica
4 Lee (collectively with Defendants, the “parties”), by and through their respective counsel of
5 record, hereby enter into the following stipulation:

6 WHEREAS on March 7, 2013 the Court issued a Case Management Scheduling Order
7 (“Scheduling Order”) stating that all non-expert discovery must be completed on or before June
8 21, 2013;

9 WHEREAS several sets of discovery requests propounded by plaintiff and Stonebridge
10 remain outstanding;

11 WHEREAS the parties have been engaged in pursuing other discovery, including
12 discovery against third parties;

13 WHEREAS, on May 22, 2013, the Court issued an Order regarding Plaintiff’s proposed
14 plan to provide notice to the class of the pendency of this class action;

15 WHEREAS the parties have agreed to explore private mediation in an attempt to resolve
16 their dispute on mutually acceptable terms;

17 WHEREAS the parties desire to preserve the status quo vis-à-vis discovery and
18 implementation of the notice plan and prevent the parties and the Court from unnecessarily
19 expending additional resources pending mediation;

20 THEREFORE, subject to the approval of the Court, the parties agree and stipulate as
21 follows:

22 1. All discovery in this action, including third-party discovery, taking of depositions,
23 and litigation of discovery disputes, shall be stayed for 28 days.

24 2. Implementation of the Notice Plan shall also be stayed for 28 days.

25 3. Any deadlines for responding to any outstanding discovery shall be extended
26 28 days.

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2 4. Certain deadlines set forth in the Court's March 7, 2013 Order shall be modified as
3 follows:

	Old Deadline	New Deadline
Completion of all non-expert discovery.	June 21, 2013	July 19, 2013
Initial expert disclosures in accordance with Federal Rule of Civil Procedure 26(a)(2).	July 11, 2013	August 8, 2013
Designation of supplemental and rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2)	August 9, 2013	September 6, 2013
Completion of all expert discovery pursuant to Federal Rule of Civil Procedure 26(b)(4).	August 30, 2013	September 27, 2013
Further Case Management Conference	September 19, 2013	October 17, 2013

12 5. All other deadlines set forth in the Court's March 7, 2013 Order, including the trial
13 date, will remain unchanged.

14 6. All rights and objections with regard to any discovery, including any objections
15 based on the Scheduling Order or the June 21, 2013 discovery cut-off, are reserved and shall not
16 be waived by virtue of this stipulation. No party shall be deemed to have waived their right to
17 submit any outstanding discovery disputes to the Magistrate Judge by virtue of this stipulated
18 order.

19 7. No party will unilaterally seek, over the objection of another party, to further
20 extend any discovery deadlines. This provision does not impact the parties' rights to request the
21 Magistrate Judge to compel additional discovery after the discovery cut-off in connection with a
22 timely-filed motion regarding discovery served prior to the discovery cut-off.

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24 **IT IS SO STIPULATED.**
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Dated: May 28, 2013

MORRISON & FOERSTER LLP

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By: /s/ Tiffany Cheung
TIFFANY CHEUNG

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Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE
COMPANY

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Dated: May 28, 2013

LAW OFFICES OF ALEXANDER E.
SKLAVOS, PC

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By: /s/ Alexander Sklavos
ALEXANDER SKLAVOS

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Attorneys for Defendant
TRIFECTA MARKETING GROUP
LLC

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Dated: May 28, 2013

EDELSON LLC

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By: /s/ Ryan Andrews
RYAN ANDREWS

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ATTESTATION OF FILER

I, Tiffany Cheung, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories. *See* L.R. 5-1(i)(3).

Dated: May 28, 2013

By: /s/ Tiffany Cheung
TIFFANY CHEUNG
MORRISON & FOERSTER LLP

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 5/28/13

Hon. Richard Seeborg
United States District Judge